

**PLAINTIFF’S RESPONSE IN OPPOSITION TO
DEFENDANTS’ MOTION FOR CONTINUANCE**

Pulliam v. County of Fort Bend, Texas, et al.

Case No. 4:22-cv-4210

EXHIBIT 4

From: Hedges, Kevin <Kevin.Hedges@fortbendcountytexas.gov>
Sent: Thursday, July 20, 2023 8:03 AM
To: Christie Hebert <chebert@ij.org>
Cc: Svatek, Amy <Amy.Svatek@fortbendcountytexas.gov>; Molly Hanis <mhanis@ij.org>; Jeff Rowes <jrowes@ij.org>
Subject: RE: 7/24/23 Deposition Logistics & 30(b)(6) Follow up

Hi Christie.

Sorry about the late response. I have an infection in my jaw that has had me at home for the majority of the last two weeks. I am on my second round of antibiotics, and have two root canals scheduled for next Tuesday, assuming that the Clindomycin that I am taking now clears up the infection enough to go forward. When I have felt well enough to come in, I have typically worked half a day then gone back home.

I had to reschedule my meeting with the Sheriff until July 14th due to my health problems. He will be the County's designee for the deposition. He told me that he had availability the weeks of August 21 and 28th if you want to take a stand-alone deposition rather than covering the material in his deposition.

I came in the office this morning, but I am fading fast. I doubt I will be able to work all day. I am not sure whether I will be physically able to present James and Hartsfield on Monday. Rather than play it by ear, I want to ask for three things: (1) can I get a one week extension on the written discovery and requests for admission currently due tomorrow? (2) can we reschedule the deposition for Hartsfield and James currently set for Monday? And (3) do you oppose an extension until July 28th on my answer date?

Thank you for your understanding. Believe me when I say that I would rather be working on my cases than experiencing this problem

Thanks.
Kevin

From: Christie Hebert <chebert@ij.org>
Sent: Monday, July 17, 2023 1:06 PM
To: Hedges, Kevin <Kevin.Hedges@fortbendcountytexas.gov>
Cc: Svatek, Amy <Amy.Svatek@fortbendcountytexas.gov>; Molly Hanis <mhanis@ij.org>; Jeff Rowes <jrowes@ij.org>
Subject: 7/24/23 Deposition Logistics & 30(b)(6) Follow up

Kevin,

First, below is the information we received from the Zoom platform for the depositions for Detective Travis James and Officer Robert Hartfield. We understand that the email has the disclaimer that all parties were given the same email, but we wanted to make sure that you received it.

Second, you previously informed me that you were meeting with the Sheriff's Office on July 7th to discuss the designations for the Rule30(b)(6) Deposition Notice that we sent you on June 27, 2023. Can you provide us with potential dates and the individuals who Fort Bend County is designating for the topics?

Third, to facilitate the July 24th zoom depositions, we plan on providing links to the videos that we expect to use as exhibits before the depositions. If all goes well, we plan on sharing those links or files with you on Friday.

I look forward to hearing from you,
Christie

Good Morning,

Please note: All parties involved in this matter are included in this email.

We have two requests to ensure you will have full functionality of the Zoom platform.

1. Please join with a laptop or desktop rather than a tablet or phone so you will be able to download and review exhibits.
2. Please update your Zoom software to ensure that you are running the latest version of Zoom. See below for instructions on how to update.

GolkowRemote Room 27 is inviting you to a scheduled Zoom meeting.

Topic: Detective Travis James; Officer Robert Hartfield-Justin Pulliam v. County of Fort Bend, Texas
Time: Jul 24, 2023 09:00 AM Central Time (US and Canada)

Join Zoom Meeting

<https://golkow.zoom.us/j/86922864692?pwd=VnBLM0ppb0dRaG4zNkpkOFFXbGVldz09>

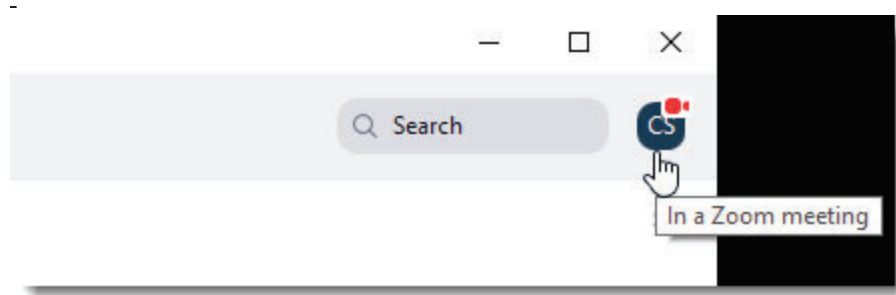
Meeting ID: 869 2286 4692

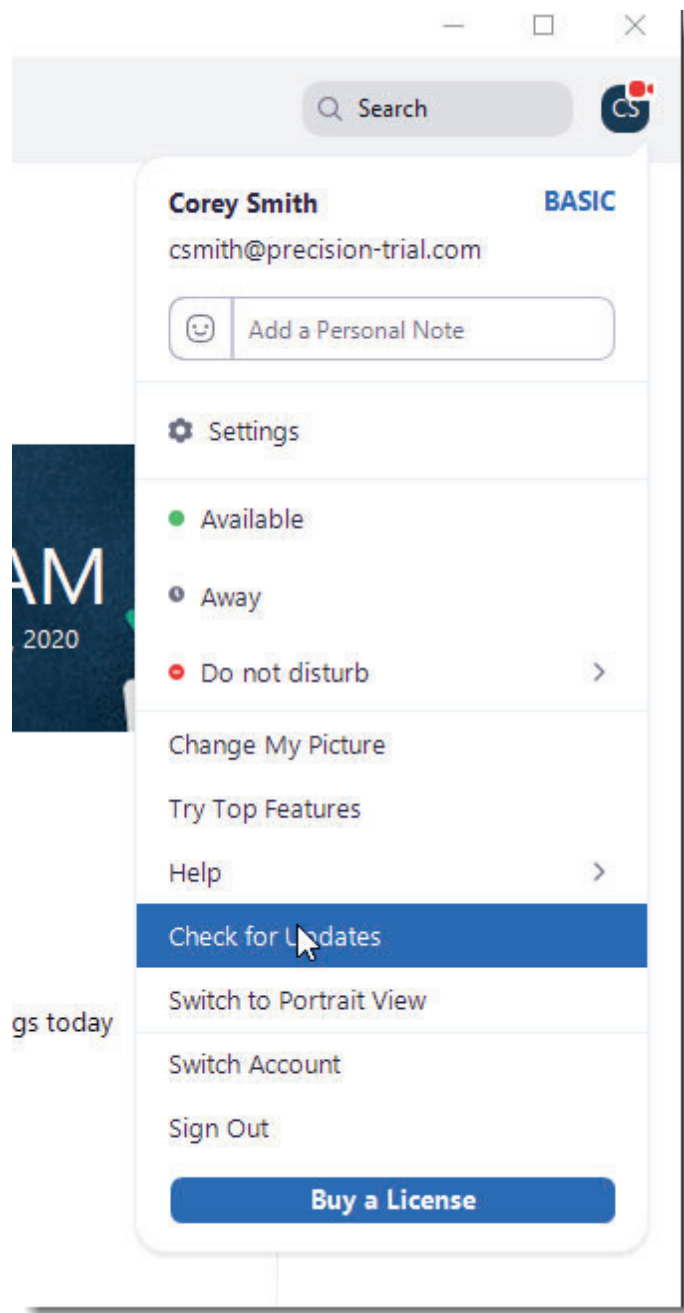
Passcode: 015871

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- +1 309 205 3325 US

If you have any questions, please email us at scheduling@golkow.com





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